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U.S. BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
NEW YORK

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June 7, 2012

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Hon. Carla E. Craig
Chief United States Bankruptcy Judge
United States Bankruptcy Court
Eastern District of New York
271 Cadman Plaza
Brooklyn, NY 11201

Re: In re Starbrite Properties Corp.
Case No. 11-40758 (CEC)
Wayne Greenwald and Carlos Cuevas

Dear Chief Judge Craig:

I am Professional Responsibility Counsel for Wayne Greenwald, Esq. and Carlos Cuevas, Esq. My retention is limited to addressing the ethics issues you raised about their conduct in the above matter. I was retained a few weeks ago, immediately after your Honor informed them at a court conference, on April 18, 2012, that you had concerns about their actions with respect to this matter. After we reviewed the Court's recent decision on their sealing application, dated June 5, 2012, we decided to respectfully request that you not forward the sealing decision to the State Disciplinary Authorities until after my clients have had a full and fair opportunity to be heard on the ethical issues you raise.

Needless to say, Mr. Greenwald and Mr. Cuevas are extremely concerned about the allegations in your decision. However, there are many critical facts that you have not yet been provided that we believe will change your view as to their conduct. It is these additional facts in conjunction with a comprehensive survey of the applicable ethics rules that we believe will convince you that they did not engage in professional misconduct. As you may be aware, a decision by this Court may act as collateral estoppel in a state disciplinary proceeding and that is why my clients want to clarify and correct a number of facts so that you have a full and accurate record upon which to reach a decision.

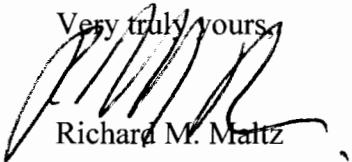
Last week, prior to your written sealing decision, I presented a written submission to the United States Trustee's office to briefly present our position on the pertinent ethical issues and we met a few days ago so that I could focus on the issues that they deemed relevant. Marylou Martin, Esq. and Alicia Leonard, Esq. agreed to allow me to supplement my prior submission to address the issues that they viewed as pertinent. I will be providing them the supplemental submission within the next few weeks.

RICHARD M. MALTZ, PLLC

Hon. Carla E. Craig
June 8, 2012
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With the Court's permission, I would like to file these submissions with the Court before any further action, if any, is taken. I have spoken to Marylou Martin, Esq. about adjourning the next conference scheduled for June 14 so that I may submit my comprehensive supplemental submission to her before we proceed. An adjournment would provide Ms. Martin and her office a full opportunity to review and incorporate our perspective, if appropriate, in their report to the Court. I believe Ms. Martin has already been in contact with the Court about the next court day and I will confirm with her the results of her inquiry.

I thank the Court for its consideration and would respectfully request that the Court not forward the Court's sealing order to the disciplinary authorities until the facts and issues have been fully reviewed.

Very truly yours,

Richard M. Maltz

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